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Attorneys for Plaintiffs
ALLERGAN USA, INC. and
ALLERGAN INDUSTRIE, SAS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ALLERGAN USA, INC., and
ALLERGAN INDUSTRIE, SAS,

Plaintiffs,

v.

MEDICIS AESTHETICS, INC.,
MEDICIS PHARMACEUTICAL CORP.,
VALEANT PHARMACEUTICALS
NORTH AMERICA LLC,
VALEANT PHARMACEUTICALS
INTERNATIONAL, and
VALEANT PHARMACEUTICALS
INTERNATIONAL, INC.

Defendants.

Case No. 8:13-cv-01436 AG (JPRx)

**DECLARATION OF ELIZABETH
M. FLANAGAN IN SUPPORT OF
PLAINTIFFS' OPENING CLAIM
CONSTRUCTION BRIEF**

Date: July 22, 2014

Time: 9:00 am

Ctrm: 10D

Judge: Hon. Andrew J. Guilford

1 I, Elizabeth M. Flanagan, declare as follows:

2 1. I am an attorney at Fish & Richardson P.C., and have been admitted
3 *pro hac vice* in the above-captioned litigation as counsel for Plaintiffs Allergan
4 USA, Inc., and Allergan Industrie, SAS (“Allergan”).

5 2. Attached hereto as Exhibit A is a true and correct copy of U.S. Patent
6 No. 8,450,475.

7 3. Attached hereto as Exhibit B is a true and correct copy of U.S. Patent
8 No. 8,357,795.

9 4. Attached hereto as Exhibit C is a true and correct copy of a page from
10 the Random House Webster’s College Dictionary, defining the word “stable.”

11 5. Attached hereto as Exhibit D is a true and correct copy of a page from
12 Concise Oxford English Dictionary, defining the word “stable.”

13 6. Attached hereto as Exhibit E is a true and correct copy of a page from
14 the Random House Webster’s College Dictionary, defining the word “crosslink.”

15 7. Attached hereto as Exhibit F is a true and correct copy of an excerpt
16 from the Medicis Pharmaceutical Corporation Annual Report dated 1/01/09-
17 12/31/09 concerning PMA P040024 for Restylane® Injectable Gel, bearing bates
18 number VAL0037758.

19 I declare under penalty of perjury under the laws of the United States that the
20 foregoing is true and correct.

21 Dated: June 13, 2014

FISH & RICHARDSON P.C.

22
23 By: /s/ Elizabeth M. Flanagan
24 Elizabeth M. Flanagan

25 Attorneys for Plaintiffs
26 ALLERGAN USA, INC. and
27 ALLERGAN INDUSTRIE, SAS
28

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on June 13, 2014 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Civil Local Rule 5.4. Any other counsel of record will be served by electronic mail, facsimile and/or overnight delivery.

/s/ Elizabeth M. Flanagan

Elizabeth M. Flanagan

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